

## UNITED STATES DISTRICT COURT

for the  
Western District of Texas**FILED**

June 24, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXASUnited States of America  
v.BY: Fidel Morales  
DEPUTY

Case No.

Maria Dolores MARTINEZ-Serrano  
Defendant(s)**EP:24-M-02596-MAT****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2024 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

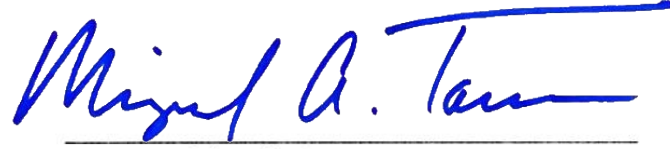
18 U.S.C. 1546(a)

did possess and attempted to use a document prescribed by statute and regulation for entry into the United States; namely a United States State of New Mexico birth certificate knowing it to have been falsely made.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Complaint sworn to telephonically on  
June 24, 2024 at 02:00 PM and signed  
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**  
Complainant's signatureJulia A. Diaz  
CBP Enforcement Officer

Sworn to before me and signed in my presence.

Date: June 24, 2024City and state: El Paso, TexasJudge's signature  
Miguel A. Torres  
Magistrate Judge

### **FACTS**

On or about June 21, 2024, the DEFENDANT, Maria Dolores MARTINEZ-Serrano, a native and citizen of Mexico, attempted to enter the United States via primary pedestrian at the Area Port of Ysleta in El Paso, Texas located in the Western District of Texas. The DEFENDANT applied for admission into the United States from Mexico by presenting a State of New Mexico birth certificate and State of New Mexico Identification Card to the primary Customs and Border Protection Officer (CBPO). The DEFENDANT stated she was coming from visiting family in Mexico and was going home. CBPO noticed discrepancies in the security features of the documents the DEFENDANT presented. CBPO asked the DEFENDANT if the documents she presented belonged to her to which she stated yes. CBPO noticed inconsistencies in the DEFENDANT's answers about the documents and suspected the DEFENDANT might have made a false claim to U.S. Citizenship and referred her into secondary for further inspection.

In secondary the DEFENDANT admitted she is a citizen and national from Mexico not in possession of any legal entry documents. The DEFENDANT was served with Form I-214 Warning of Rights (Spanish version) which she read, understood, signed, waived her right to counsel, and voluntarily agreed to give a statement. The DEFENDANT stated she had previously lived in the United States illegally but returned to Mexico due to her husband's death. The DEFENDANT stated a friend of hers got her in contact with an individual that could provide her with documents to enter the United States. The DEFENDANT stated she agreed to pay \$100,000 Mexican Pesos for the birth certificate and identification card once she started working in the United States. The DEFENDANT stated she traveled from Leon, Guanajuato Mexico to Ciudad Juarez where she stayed in a hotel until an unknown man provided her with the documents and arranged an Uber to take her to the port of entry. The DEFENDANT stated her intentions were to travel to Las Vegas to live with a friend and work. The DEFENDANT stated she was aware the documents were counterfeit and that it was illegal to present counterfeit documents to make entry into the United States. Database queries revealed the DEFENDANT does not possess any legal documents to enter the United States.

Because this Affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

### **CRIMINAL AND IMMIGRATION RECORD**

None can be established at this time

### **IMMIGRATION RECORD**

None can be established at this time